
APPENDIX B

EXAMPLE APPLICABLE REQUIREMENTS

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**Table B-1. POTENTIALLY APPLICABLE REQUIREMENTS
Packaging Rotogravure or Wide-Web Flexographic with Solvent Recovery Control Strategy**

Applicable Requirement	Representative SIP-RACT (all subject sources)	Example NSR Requirements	NSPS (Part 60)		MACT (Part 63)	
			Subpart A	Subpart FFF	Subpart A	Subpart KK
Emission/ Operating Limits	<ul style="list-style-type: none"> Ⓒ 90% recovery efficiency of VOCs entering system Ⓒ 75% overall control efficiency for combined capture and recovery systems Ⓒ Generally applies to emissions from the application of inks and coatings by each individual press Ⓒ May apply hourly or daily with compliance based on liquid-liquid material balance (LLMB) or performance test and continuous monitoring of VOC inlet/outlet 	<ul style="list-style-type: none"> Ⓒ Requirements generally follow SIP-RACT requirements with same or greater stringency for control of emissions Ⓒ Ranging from 70% to 98% overall control efficiency Ⓒ May include mass VOC emission limits and/or mass VOC usage limits to hold potential emissions below permitting thresholds Ⓒ Generally applies to emissions from the application of inks and coatings by the individual new or modified press or collectively by a group of new/modified presses controlled by the same solvent recovery system Ⓒ Requirements established through preconstruction review 	<ul style="list-style-type: none"> Ⓒ No additional requirements 	<ul style="list-style-type: none"> Ⓒ Applies to new rotogravure printing and/or coating of flexible (sheet or web) vinyl or urethane products [§60.580(a)] Ⓒ Applies to emissions from the application of inks and coatings by each new rotogravure printing line constructed after 1/18/83 [§60.580(b)] Ⓒ 85% overall VOC control of each affected facility [§60.582(a)(2)] 	<ul style="list-style-type: none"> Ⓒ New/reconstructed major sources must submit application for preconstruction review by EPA, or by State program that has been delegated MACT standard enforcement responsibilities [§63.5] 	<ul style="list-style-type: none"> Ⓒ Applies to major sources of HAPs with rotogravure and wide-web flexographic presses if presses apply greater than 500 kg/month of inks & coatings or 400 kg/month of organic HAPs [§63.820(a)(2) & §63.821(b)] Ⓒ Applies to all roto./flexo. presses (together) plus other optional equipment [§63.821(a)(2)] Ⓒ Overall organic HAP control efficiency of at least 95% each month, <i>or</i> Ⓒ Emission rate of no more than 0.2 kg organic HAP per kg. solids applied, monthly average, as-applied basis, <i>or</i> Ⓒ Emission rate of no more than 0.04 kg organic HAP per kg material applied, monthly average, as-applied basis, <i>or</i> Ⓒ Option based on weighted calculations between alternatives [§63.825(7), (8), (9), or (10)]

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**Table B-1. POTENTIALLY APPLICABLE REQUIREMENTS
Packaging Rotogravure or Wide-Web Flexographic with Solvent Recovery Control Strategy**

Applicable Requirement	Representative SIP-RACT (all subject sources)	Example NSR Requirements	NSPS (Part 60)		MACT (Part 63)	
			Subpart A	Subpart FFF	Subpart A	Subpart KK
Other - Work Practice Standards	<ul style="list-style-type: none"> ☐ Operation & maintenance of control devices and monitors according to manufacturer recommendations ☐ Material handling and good housekeeping practices may also apply 	☐ Same as SIP-RACT requirements	☐ Operate and maintain affected facility and control equipment consistent with good air pollution control practices [§60.11(d)]	☐ See Subpart A	<ul style="list-style-type: none"> ☐ Operate and maintain source and control equipment consistent with good air pollution control practices [§63.6(e)(1)] ☐ Develop and implement a written start-up, shutdown, and malfunction (SSM) plan for affected source and control equipment [§63.6(e)(3)] 	☐ See Subpart A

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**Table B-1. POTENTIALLY APPLICABLE REQUIREMENTS
Packaging Rotogravure or Wide-Web Flexographic with Solvent Recovery Control Strategy**

Applicable Requirement	Representative SIP-RACT (all subject sources)	Example NSR Requirements	NSPS (Part 60)		MACT (Part 63)	
			Subpart A	Subpart FFF	Subpart A	Subpart KK
Testing	<ul style="list-style-type: none"> ☐ Initial compliance test of solvent recovery device efficiency including VOC continuous emission monitors and capture efficiency <i>or</i> ☐ Conduct of LLMB study over extended time period (i.e., month) to determine recovery efficiency ☐ VOC content of materials based on M24, of 40 CFR Part 60, Appendix A) and/or supplier formulation data ☐ May require periodic re-testing 	☐ Same as SIP-RACT requirements	<ul style="list-style-type: none"> ☐ Conduct performance test 60 -180 days after start-up in accordance with test methods and procedures in applicable standard ☐ Provide at least 30 days notice of scheduled test date [§60.8] ☐ Continuous monitoring systems (CMS) must be subject to a performance evaluation during performance test [§60.13(c)] 	<ul style="list-style-type: none"> ☐ Performance test under, continuous normal operating conditions consisting of 3 runs (minimum of 30 minutes each) measuring recovery system VOC inlet and outlet concentrations simultaneously and volumetric flowrate; capture efficiency must also be determined [§60.583(d)] ☐ VOC measurements based on M25A [§60.583(a)] ☐ All fugitive VOC emissions shall be captured and vented through stacks suitable for measurement during test [§60.583(d)(4)] ☐ Performance test determines the average exhaust vent VOC concentration [§60.584(a)(2)] 	<ul style="list-style-type: none"> ☐ If required, initial performance test required within 180 days of the effective date of standard or after initial start-up of new unit [§63.7(a)] ☐ Notification of test at least 60 days in advance [§63.7(b)] ☐ Development and, if requested, submittal of site-specific test plan at least 60 days in advance of test [§63.7(c)] ☐ Performance test shall be conducted under normal operating conditions [§63.7(e)] ☐ CMS Performance Evaluations for VOC inlet/outlet mass rate monitoring system with initial test [§63.8(e)] 	<ul style="list-style-type: none"> ☐ If compliance based on monthly LLMB, no performance test required [§63.827(a)(3)] ☐ Conduct monthly LLMB [§63.825(c)(1)] ☐ Determine volatile matter content and other properties required to conduct LLMB based on M24 or formulation data [§63.827(c)(2) & (c)(3)] ☐ If compliance based on monitoring VOC inlet & outlet mass rates, conduct initial performance for capture efficiency using Procedure T (M204) [§63.825(c)(2) & §63.827(e)] ☐ Operate monitoring system for capture efficiency operating parameter during initial test [§63.828(a)(5)] ☐ Conduct quarterly audits of CMS in accordance with Appendix F of 40 CFR part 60 [§63.828(a)(2)(I)] ☐ See Subpart A

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**Table B-1. POTENTIALLY APPLICABLE REQUIREMENTS
Packaging Rotogravure or Wide-Web Flexographic with Solvent Recovery Control Strategy**

Applicable Requirement	Representative SIP-RACT (all subject sources)	Example NSR Requirements	NSPS (Part 60)		MACT (Part 63)	
			Subpart A	Subpart FFF	Subpart A	Subpart KK
Monitoring	<ul style="list-style-type: none"> Ⓒ For LLMB, VOC usage and VOC recovered over specified time period Ⓒ For VOC monitoring, inlet and outlet VOC concentration and/or mass rate Ⓒ VOC monitoring approach may require parameter monitoring for capture monitoring (i.e., differential pressure if permanent total enclosure) Ⓒ May require parameter monitoring for capture and control systems including development and submittal of compliance assurance monitoring (CAM) plan with the initial and/or renewal title V application [§64.1 - §64.10] Ⓒ For LLMB, may be exempt from CAM rule if recovery system qualifies as “inherent process equipment” rather than “control device.” System’s primary purpose must be for other than air compliance and compliance must not require higher efficiency than normal process operating conditions [§64.1] 	<ul style="list-style-type: none"> Ⓒ Same as SIP-RACT requirements 	<ul style="list-style-type: none"> Ⓒ Required CMS subject to the applicable performance specifications in Appendix B and quality assurance procedures in Appendix F [§60.13(a)] Ⓒ Required monitors installed and operational prior to time of performance test consistent with manufacturer’s recommendations for installation, operation, and calibration [§60.13(b)] Ⓒ Record four or more data points equally spaced over each hour; do not include data recorded during breakdowns, repairs, calibrations, etc. [§60.13(h)] Ⓒ Conduct daily CMS zero, span, and drift calibration [§60.13(d)] 	<ul style="list-style-type: none"> Ⓒ Install, calibrate, operate, and maintain system for continuously measuring and recording VOC concentration of exhaust stream [§60.584(a)] 	<ul style="list-style-type: none"> Ⓒ Operate and maintain CMS consistent with good air pollution control practices, in accordance with manufacturer’s specifications for installation, operation and calibration [§63.8(c)(1) -(c)(3)] Ⓒ Conduct daily zero and span calibration checks [§63.8(c)(6)] 	<ul style="list-style-type: none"> Ⓒ For LLMB, measure cumulative amount of volatile matter and HAP consumed and amount of volatile matter recovered by the solvent recovery device Ⓒ Install, calibrate, maintain, and operate device, certified to within ± 2.0 percent to measure the cumulative amount of volatile matter recovered [§63.825(c)(1)] Ⓒ For VOC inlet/outlet, continuously measure and record inlet and outlet VOC concentrations and volumetric flow rates [§63.828(a)(2)] Ⓒ For VOC inlet/outlet, monitor capture efficiency parameter in accordance with capture efficiency monitoring plan [§63.828(a)(5)]

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Packaging Rotogravure or Wide-Web Flexographic with Solvent Recovery Control Strategy**

Applicable Requirement	Representative SIP-RACT (all subject sources)	Example NSR Requirements	NSPS (Part 60)		MACT (Part 63)	
			Subpart A	Subpart FFF	Subpart A	Subpart KK
Recordkeeping	<ul style="list-style-type: none"> ☐ Solvent recovery system operation and maintenance procedures ☐ Preventative maintenance and/or malfunction prevention and abatement plan ☐ Maintenance logs for control, capture, and monitoring equipment ☐ material properties and usage data, source operation data, and calculations to support compliance demonstration ☐ For VOC inlet/outlet, recovery system efficiency calculations for specified time period ☐ Results from performance tests 	☐ Same as SIP-RACT requirements	<ul style="list-style-type: none"> ☐ Occurrence and duration of any SSM of the affected facility; any malfunction of the control system; or any periods inoperative continuous monitors [§60.7(b)] ☐ Records of all CMS and device measurements, performance evaluations, calibration checks, and adjustments and maintenance performed [§60.7(f)] 	<ul style="list-style-type: none"> ☐ Average exhaust gas VOC concentration measured during initial test ☐ Record for each 3-hour clock period that the average exhaust vent VOC concentration is greater than 50 ppm and more than 20% greater than the average concentration demonstrated during the most recent performance test [§60.584(a)(2)] ☐ Time periods of operation when control device not in use [§60.584(d)] ☐ See Subpart A 	<ul style="list-style-type: none"> ☐ Written SSM plan for the source, control system, and monitoring system [§63.6(e)(3)(v)] ☐ Records showing consistency of actions with SSM plan [§63.6(e)(3)(iii) & §63.10(b)(2)] ☐ Records showing any actions inconsistent with SSM plan [§63.6(e)(3)(iv)] ☐ Written CMS quality control program [§63.8(d)] ☐ Records of data from CMS measurements, audits, calibrations, and malfunctions [§63.10(b)(2) & §63.10(c)] ☐ Records of all reports and notifications [§63.10(b)] ☐ Records of each applicability determination [§63.10(b)(3)] 	<ul style="list-style-type: none"> ☐ For LLMB, amount of volatile matter and HAP consumed and amount of volatile matter recovered for each month [§63.829(c)] ☐ For VOC inlet/outlet, monthly summaries of continuous monitoring data, capture efficiency parameter data, and control efficiency calculations as rolling 3-hour averages ☐ Calculations for monthly: overall control efficiency, or HAP emission rate per solids applied, or HAP emission rate per material applied [§63.825(c)(2) & §63.829(b)] ☐ See Subpart A

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Packaging Rotogravure or Wide-Web Flexographic with Solvent Recovery Control Strategy**

Applicable Requirement	Representative SIP-RACT (all subject sources)	Example NSR Requirements	NSPS (Part 60)		MACT (Part 63)	
			Subpart A	Subpart FFF	Subpart A	Subpart KK
Reporting	<ul style="list-style-type: none"> ☐ Periodic Compliance Reports ☐ Performance test protocol (if test required) ☐ Test notification ☐ Test results report ☐ Annual VOC emission statements 	☐ Same as SIP-RACT requirements	<ul style="list-style-type: none"> ☐ Notification of: commencement of construction, start-up, and CMS performance evaluation [§60.7(a)] ☐ Semiannual excess emissions and monitoring system performance report [§60.7(c) & 7(d)] ☐ Initial performance test report [§60.8(a)] ☐ CMS performance evaluation report for initial performance test [§60.13(b)(2)] 	<ul style="list-style-type: none"> ☐ Performance test data and results [§60.585(a)] ☐ Semiannual reports of exceedances of the average value of exhaust vent VOC concentration [§60.585(b)] ☐ See Subpart A 	<ul style="list-style-type: none"> ☐ Initial notification of standard applicability [§63.9(b)] ☐ SSM plan submittal, if requested [§63.6(e)(3)(v)] ☐ Notification of initial performance test and submittal of site-specific test plan if requested [§63.7(b), 7(c) & 9(e)] ☐ Submittal of test report [§63.7(g)] ☐ Semiannual SSM reports [§63.10(d)(5)(I)] ☐ Reports on operation inconsistencies with SSM plan [§63.6(e)(3)(iv)] ☐ Notification of CMS performance evaluation, submittal of evaluation plan and evaluation results [§63.8(e), 9(g)(1) & 10(e)(2)] ☐ Notification of Compliance Status Report [§63.9(h)] ☐ Semiannual excess emissions and CMS performance report 	<ul style="list-style-type: none"> ☐ Capture Compliance Monitoring Plan with the Notification of Compliance Status Report (not applicable to LLMB) ☐ See Subpart A

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**Table B-2. POTENTIALLY APPLICABLE REQUIREMENTS
Packaging Rotogravure or Wide-Web Flexographic with Compliant Inks/Coatings Control Strategy**

Applicable Requirement	Representative SIP-RACT (all subject sources)	Example NSR Requirements	NSPS (Part 60)		MACT (Part 63)	
			Subpart A	Subpart FFF	Subpart A	Subpart KK
Emission/ Operating Limits	<ul style="list-style-type: none"> ☐ The volatile fraction of ink, as it is applied to the substrate, contains 25% by volume or less of VOC and 75% by volume or more of water; <i>or</i> ☐ The ink, as it is applied to the substrate, less water, contains 60% by volume or more nonvolatile material ☐ Generally applies based on daily average of volume fractions for all inks/coatings applied by each individual press 	<ul style="list-style-type: none"> ☐ Requirements generally follow SIP-RACT requirements with same or greater stringency for compliant coating specifications ☐ May include mass VOC emission limits and/or mass VOC usage limits to hold potential emissions below permitting thresholds ☐ Generally applies based on daily average of volume fractions for all inks/coatings applied by each individual new or modified press 	<ul style="list-style-type: none"> ☐ No additional requirements 	<ul style="list-style-type: none"> ☐ Applies to new rotogravure printing and/or coating of flexible (sheet or web) vinyl or urethane products [§60.580(a)] ☐ Applies to weighted average of all inks and coatings applied by each individual new rotogravure printing line constructed after 1/18/83 [§60.580(b)] ☐ Use inks with a weighted average VOC content less than 1.0 kilogram VOC per kilogram ink solids [§60.582(a)(1)] ☐ Weighted over period of no more than a month for subject printing line [§60.583(a)(3)] 	<ul style="list-style-type: none"> ☐ New/reconstructed major sources must submit application for preconstruction review by EPA, or by State program that has been delegated MACT standard enforcement responsibilities [§63.5] 	<ul style="list-style-type: none"> ☐ Applies to major sources of HAPs with rotogravure and wide-web flexographic presses if presses apply greater than 500 kg/month of inks & coatings or 400 kg/month of organic HAPs [§63.820(a)(2) & §63.821(b)] ☐ Applies to all roto./flexo. presses (together) plus other optional equipment [§63.821(a)(2)] ☐ Complying without controls requires organic HAP emissions no more than 4% of the mass of inks applied for the month, <i>or</i> ☐ no more than 20% of the mass of solids applied for the month, <i>or</i> ☐ Calculated equivalent allowable mass based on the organic HAP and solids contents ☐ Averaged over month across affected facility [§63.825(b)]

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**Table B-2. POTENTIALLY APPLICABLE REQUIREMENTS
Packaging Rotogravure or Wide-Web Flexographic with Compliant Inks/Coatings Control Strategy**

Applicable Requirement	Representative SIP-RACT (all subject sources)	Example NSR Requirements	NSPS (Part 60)		MACT (Part 63)	
			Subpart A	Subpart FFF	Subpart A	Subpart KK
Other - Work Practice Standards	☐ Material handling and good housekeeping practices may apply	☐ No additional requirements	☐ Operate and maintain affected facility consistent with good air pollution control practices [§60.11(d)]	☐ See Subpart A	☐ Operate and maintain source consistent with good air pollution control practices [§63.6(e)(1)]	☐ See Subpart A
Testing	☐ For each applied material, determine VOC, exempt solvent and water content, density, and volume and weight fraction solids, based on M24 (40 CFR Part 60, Appendix A) and/or supplier formulation data	☐ Same as SIP-RACT requirements	☐ No additional requirements	☐ Determination of weighted VOC content of the inks calculated for periods not exceeding a calendar month (considered as performance test) [§60.583(b)(3)] ☐ Determination based on manufacturers' formulation data for purchased materials, facility blending records, and/or M24 analyses of the applied materials [§60.583(b)(4)] ☐ Only M24 data can be used to determine VOC content of inks to be discarded [§60.583(c)(3)]	☐ No additional requirements	☐ Determination of organic HAP content of applied materials based on data from M311 (40 CFR Part 63, Appendix A) and/or manufacturers' formulation data on certified product data sheets (CPDSs), or use volatile matter content data to represent organic HAP content [§63.827(b)(2)] ☐ Determination of volatile matter content of applied materials based on M24 data and/or manufacturers' formulation data [§63.827(c)(2)]

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**Table B-2. POTENTIALLY APPLICABLE REQUIREMENTS
Packaging Rotogravure or Wide-Web Flexographic with Compliant Inks/Coatings Control Strategy**

Applicable Requirement	Representative SIP-RACT (all subject sources)	Example NSR Requirements	NSPS (Part 60)		MACT (Part 63)	
			Subpart A	Subpart FFF	Subpart A	Subpart KK
Monitoring	<ul style="list-style-type: none"> Applied material usage and VOC, water, exempt solvents, and solids content data 	<ul style="list-style-type: none"> Same as SIP-RACT requirements 	<ul style="list-style-type: none"> No additional requirements 	<ul style="list-style-type: none"> Applied material usage and VOC content data for each affected facility to determine weighted average VOC content [§60.583(b)(1) & (b)(2)] May determine weighted average VOC content based on inventory tracking system for each affected facility for each averaging period [§60.583(c)(1)] 	<ul style="list-style-type: none"> No additional requirements 	<ul style="list-style-type: none"> Applied material usage and HAP and VOC content and solids content data needed to demonstrate compliance [§63.829(b)(1)]
Recordkeeping	<ul style="list-style-type: none"> Applied material usage and property data and calculations demonstrating compliance for each averaging time and applicable unit 	<ul style="list-style-type: none"> Same as SIP-RACT requirements 	<ul style="list-style-type: none"> No additional requirements 	<ul style="list-style-type: none"> Applied material usage and property data and calculations demonstrating compliance for each averaging time and affected unit [§60.583(b) & (c)] 	<ul style="list-style-type: none"> Records of all reports and notifications [§63.10(b)] Records of each applicability determination [§63.10(b)(3)] 	<ul style="list-style-type: none"> Mass of each applied material consumed each month and the Organic HAP and/or volatile material content of each applied material [§63.829(b)(1)] Monthly calculations demonstrating compliance with appropriate limit [§63.829(b)(1)] See Subpart A

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**Table B-2. POTENTIALLY APPLICABLE REQUIREMENTS
Packaging Rotogravure or Wide-Web Flexographic with Compliant Inks/Coatings Control Strategy**

Applicable Requirement	Representative SIP-RACT (all subject sources)	Example NSR Requirements	NSPS (Part 60)		MACT (Part 63)	
			Subpart A	Subpart FFF	Subpart A	Subpart KK
Reporting	<ul style="list-style-type: none"> Ⓒ Periodic Compliance Reports Ⓒ Annual VOC emission statements 	<ul style="list-style-type: none"> Ⓒ Same as SIP-RACT requirements 	<ul style="list-style-type: none"> Ⓒ Notification of: commencement of construction and start-up [§60.7(a)] Ⓒ Initial performance test report [§60.8(a)] 	<ul style="list-style-type: none"> Ⓒ Initial performance test data and report [§60.583(b)(4)] Ⓒ Semiannual report of exceedances of the weighted average VOC content limit [§60.585(b)(1)] Ⓒ See Subpart A 	<ul style="list-style-type: none"> Ⓒ Initial notification of standard applicability [§63.9(b)] Ⓒ [§63.6(e)(3)(iv)] Ⓒ Notification of Compliance Status Report [§63.9(h)] Ⓒ Semiannual excess emissions report [§63.10(e)(3)] 	<ul style="list-style-type: none"> Ⓒ See Subpart A

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**Table B-3. POTENTIALLY APPLICABLE REQUIREMENTS
Publication Rotogravure with Solvent Recovery Control Strategy**

Applicable Requirement	Representative SIP-RACT (all subject sources)	Example NSR Requirements	NSPS (Part 60)		MACT (Part 63)	
			Subpart A	Subpart QQ	Subpart A	Subpart KK
Emission/ Operating Limits	<ul style="list-style-type: none"> Ⓒ 90% recovery efficiency of VOC's entering system Ⓒ 75% overall control efficiency for combined capture and recovery systems Ⓒ Generally applies to emissions from the application of inks and coatings by each individual printing press Ⓒ May apply hourly or daily with compliance based on liquid-liquid material balance (LLMB) or performance test and continuous monitoring of VOC inlet/outlet 	<ul style="list-style-type: none"> Ⓒ Requirements generally follow SIP-RACT requirements with same or greater stringency for control of emissions Ⓒ Ranging from 75% to 98% overall control efficiency Ⓒ May include mass VOC emission limits and/or mass VOC usage limits to hold potential emissions below permitting thresholds Ⓒ Generally applies to emissions from the application of inks and coatings by the individual new or modified press or collectively by a group of new/modified presses controlled by the same solvent recovery system Ⓒ Requirements established through preconstruction review 	<ul style="list-style-type: none"> Ⓒ No additional requirements 	<ul style="list-style-type: none"> Ⓒ Applies to rotogravure production presses installed after October 28, 1980 [§60.430] Ⓒ Applies to emissions from the application of inks and coatings by the individual new or modified press or collectively by a group of new/modified presses controlled by the same solvent recovery system [§60.430(a) & §60.4330(d)] Ⓒ Emit no more than 16% of the total mass of VOC solvent and water used during any one performance period (4 weeks or 1 month) [§60.432] 	<ul style="list-style-type: none"> Ⓒ New/reconstructed major sources must submit application for preconstruction review by EPA, or by State program that has been delegated MACT standard enforcement responsibilities [§63.5] 	<ul style="list-style-type: none"> Ⓒ Applies to all publication press and affiliated equipment [§63.821(a)] Ⓒ Emit no more organic HAP than 8% of the total volatile matter (including water) used each month [§63.824(b)]

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**Table B-3. POTENTIALLY APPLICABLE REQUIREMENTS
Publication Rotogravure with Solvent Recovery Control Strategy**

Applicable Requirement	Representative SIP-RACT (all subject sources)	Example NSR Requirements	NSPS (Part 60)		MACT (Part 63)	
			Subpart A	Subpart QQ	Subpart A	Subpart KK
Other - Work Practice Standards	C Operation & maintenance of control devices and monitors according to manufacturer recommendations	C Same as SIP-RACT requirements	C Operate and maintain affected facility and control equipment consistent with good air pollution control practices [§60.11(d)]	C See Subpart A	C Operate and maintain source and control equipment consistent with good air pollution control practices [§63.6(e)(1)] C Develop and implement a written start-up, shutdown, and malfunction (SSM) plan for affected source and control equipment [§63.6(e)(3)]	C See Subpart A

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**Table B-3. POTENTIALLY APPLICABLE REQUIREMENTS
Publication Rotogravure with Solvent Recovery Control Strategy**

Applicable Requirement	Representative SIP-RACT (all subject sources)	Example NSR Requirements	NSPS (Part 60)		MACT (Part 63)	
			Subpart A	Subpart QQ	Subpart A	Subpart KK
Testing	<ul style="list-style-type: none"> Ⓒ Initial compliance test of solvent recovery device efficiency including VOC continuous emission monitors and capture efficiency <i>or</i> Ⓒ Conduct of LLMB study over extended time period (i.e., month) to determine recovery efficiency Ⓒ VOC content of materials based on M24A (40 CFR Part 60, Appendix A) and/or supplier formulation data Ⓒ May require periodic re-testing 	<ul style="list-style-type: none"> Ⓒ Same as SIP-RACT requirements 	<ul style="list-style-type: none"> Ⓒ Conduct performance test 60 -180 days after start-up in accordance with test methods and procedures in applicable standard Ⓒ Provide at least 30 days notice of scheduled test date [§60.8] Ⓒ Continuous monitoring system (CMS) must be subject to a performance evaluation during performance test [§60.13(c)] 	<ul style="list-style-type: none"> Ⓒ Initial performance test over 30 calendar days measuring LLMB including temperature and liquid densities of solvent and water-based materials [§60.433] Ⓒ <i>Solvent-borne ink systems</i> - determine VOC content from M24A each week or per shipment, or from formulation data per shipment [§60.435(a)] Ⓒ <i>Water-borne ink systems</i> - determine the VOC and water content from the formulation data with each shipment; or analysis of samples of each shipment [§60.435(c)] Ⓒ Determine the density of raw inks, related coatings, and VOC solvent by making a total of three determinations for each liquid at specified temperatures using ASTM D 1475-60; or using literature values acceptable to the Administrator [§60.435(d)] 	<ul style="list-style-type: none"> Ⓒ If required, initial performance test required within 180 days of the effective date of standard or after initial start-up of new unit [§63.7(a)] Ⓒ Notification of test at least 60 days in advance [§63.7(b)] Ⓒ Development and, if requested, submittal of site-specific test plan at least 60 days in advance of test [§63.7(c)] Ⓒ Performance test shall be conducted under normal operating conditions [§63.7(e)] Ⓒ CMS Performance Evaluations for VOC inlet/outlet mass rate monitoring system with initial test [§63.8(e)] 	<ul style="list-style-type: none"> Ⓒ If compliance based on monthly LLMB, no performance test required [§63.827(a)(3)] Ⓒ Conduct monthly LLMB [§63.824(b)(1)(I)] Ⓒ If compliance based on monitoring VOC inlet & outlet mass rates, conduct initial performance for capture efficiency using Procedure T (M204) [§63.824(b)(1)(ii) & §63.827(e)] Ⓒ Operate monitoring system for capture efficiency operating parameter during initial test [§63.828(a)(5)] Ⓒ Conduct quarterly audits of CMS in accordance with Appendix F of 40 CFR part 60 [§63.828(a)(2)(I)] Ⓒ See Subpart A

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**Table B-3. POTENTIALLY APPLICABLE REQUIREMENTS
Publication Rotogravure with Solvent Recovery Control Strategy**

Applicable Requirement	Representative SIP-RACT (all subject sources)	Example NSR Requirements	NSPS (Part 60)		MACT (Part 63)	
			Subpart A	Subpart QQ	Subpart A	Subpart KK
Monitoring	<ul style="list-style-type: none"> Ⓒ For LLMB, VOC usage and VOC recovered over specified time period Ⓒ For VOC monitoring, inlet and outlet VOC concentration and/or mass rate Ⓒ VOC monitoring approach may require parameter monitoring for capture monitoring (i.e., differential pressure if permanent total enclosure) Ⓒ May require parameter monitoring for capture and control systems including development and submittal of compliance assurance monitoring (CAM) plan with the initial and/or renewal title V application [§64.1 - §64.10] Ⓒ For LLMB, may be exempt from CAM rule if recovery system qualifies as “inherent process equipment” rather than “control device.” System’s primary purpose must be for other than air compliance and compliance must not require higher efficiency than normal process operating conditions [§64.1] 	<ul style="list-style-type: none"> Ⓒ Same as SIP-RACT requirements 	<ul style="list-style-type: none"> Ⓒ Required monitors installed and operational prior to time of performance test consistent with manufacturer’s recommendations for installation, operation, and calibration [§60.13(b)] 	<ul style="list-style-type: none"> Ⓒ Amount of solvent and water used and solvent recovered for either each calendar month or 4 consecutive weeks [§60.434(a)] Ⓒ Liquid temperature (optional, if owner chooses not to use values determined in the performance test) [§60.434(a)(4)] 	<ul style="list-style-type: none"> Ⓒ Operate and maintain CMS consistent with good air pollution control practices, in accordance with manufacturer’s specifications for installation, operation and calibration [§63.8(c)(1) -(c)(3)] Ⓒ Conduct daily zero and span calibration checks [§63.8(c)(6)] 	<ul style="list-style-type: none"> Ⓒ For LLMB, measure cumulative amount of volatile matter and HAP consumed and amount of volatile matter recovered by the solvent recovery device Ⓒ Install, calibrate, maintain, and operate device, certified to within ± 2.0 percent to measure the cumulative amount of volatile matter recovered [§63.824(b)(1)(I)(D)] Ⓒ For VOC inlet/outlet, continuously measure and record inlet and outlet VOC concentrations and volumetric flow rates [§63.824(b)(1)(ii)(A)] Ⓒ For VOC inlet/outlet, monitor capture efficiency parameter in accordance with capture efficiency monitoring plan [§63.824(b)(1)(ii)(D) & §63.828(a)(5)]

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**Table B-3. POTENTIALLY APPLICABLE REQUIREMENTS
Publication Rotogravure with Solvent Recovery Control Strategy**

Applicable Requirement	Representative SIP-RACT (all subject sources)	Example NSR Requirements	NSPS (Part 60)		MACT (Part 63)	
			Subpart A	Subpart QQ	Subpart A	Subpart KK
Recordkeeping	<ul style="list-style-type: none"> ☐ Solvent recovery system operation and maintenance procedures ☐ Preventative maintenance and/or malfunction prevention and abatement plan ☐ Maintenance logs for control, capture, and monitoring equipment ☐ material properties and usage data, source operation data, and calculations to support compliance demonstration ☐ For VOC inlet/outlet, recovery system efficiency calculations for specified time period ☐ Results from performance tests 	☐ Same as SIP-RACT requirements	<ul style="list-style-type: none"> ☐ Occurrence and duration of any SSM of the affected facility and any malfunction of the control system [§60.7(b)] ☐ All measurements, testing results, and other records required for compliance demonstration maintained for 2 years [§60.7(f)] 	<ul style="list-style-type: none"> ☐ Record for each performance period of the amount of solvent and water used, solvent recovered, and estimated emissions percentage for each averaging period maintained for 2 years [§60.434(a)] ☐ Record of temperature for determining actual liquid densities during the performance test, and, at the sources option each performance averaging period [§60.434(a)(3) & (a)(4)] ☐ See Subpart A 	<ul style="list-style-type: none"> ☐ Written SSM plan for the source, control system, and monitoring system [§63.6(e)(3)(v)] ☐ Records showing consistency of actions with SSM plan [§63.6(e)(3)(iii) & §63.10(b)(2)] ☐ Records showing any actions inconsistent with SSM Plan [§63.6(e)(3)(iv)] ☐ Written CMS quality control program [§63.8(d)] ☐ Records of data from CMS measurements, audits, calibrations, and malfunctions [§63.10(b)(2) & §63.10(c)] ☐ Records of all reports and notifications [§63.10(b)] ☐ Records of each applicability determination [§63.10(b)(3)] 	<ul style="list-style-type: none"> ☐ For LLMB, amount of volatile matter and HAP consumed and amount of volatile matter recovered for each month [§63.829(c)] ☐ For VOC inlet/outlet, monthly summaries of continuous monitoring data, capture efficiency parameter data, and control efficiency calculations as rolling 3-hour averages ☐ Calculations for monthly: overall control efficiency, [§63.824(b)(1)(ii) & §63.829(b)] ☐ See Subpart A

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**Table B-3. POTENTIALLY APPLICABLE REQUIREMENTS
Publication Rotogravure with Solvent Recovery Control Strategy**

Applicable Requirement	Representative SIP-RACT (all subject sources)	Example NSR Requirements	NSPS (Part 60)		MACT (Part 63)	
			Subpart A	Subpart QQ	Subpart A	Subpart KK
Reporting	<ul style="list-style-type: none"> Ⓒ Periodic Compliance Reports Ⓒ Performance test protocol (if test required) Ⓒ Test notification Ⓒ Test results report Ⓒ Annual VOC emission statements 	<ul style="list-style-type: none"> Ⓒ Same as SIP-RACT requirements 	<ul style="list-style-type: none"> Ⓒ Notification of: commencement of construction, and start-up [§60.7(a)] Ⓒ Semiannual excess emissions report [§60.7(c) & 7(d)] Ⓒ Initial performance test report [§60.8(a)] 	<ul style="list-style-type: none"> Ⓒ See Subpart A 	<ul style="list-style-type: none"> Ⓒ Initial notification of standard applicability [§63.9(b)] Ⓒ SSM plan submittal, if requested [§63.6(e)(3)(v)] Ⓒ Notification of initial performance test and submittal of site-specific test plan if requested [§63.7(b), 7(c) & 9(e)] Ⓒ Submittal of test report [§63.7(g)] Ⓒ Semiannual SSM reports [§63.10(d)(5)(I)] Ⓒ Reports on operation inconsistencies with SSM plan [§63.6(e)(3)(iv)] Ⓒ Notification of CMS performance evaluation, submittal of evaluation plan and evaluation results [§63.8(e), 9(g)(1) & 10(e)(2)] Ⓒ Notification of Compliance Status Report [§63.9(h)] Ⓒ Semiannual excess emissions and CMS performance report [§63.10(e)(3)] 	<ul style="list-style-type: none"> Ⓒ Capture Compliance Monitoring Plan with the Notification of Compliance Status Report [§63.828(a)(5)] Ⓒ Reporting requirements in Subpart A related to SSM plan, CMS performance evaluation, capture monitoring plan, and an initial performance test do not apply if compliance strategy is based on LLMB [§63.830(b)(5)] Ⓒ See Subpart A